

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

GEM CITY MANAGEMENT INC.,

Plaintiff,

-against-

JEFFREY RINDE, CKR LAW LLP,  
DONALD HIRSCH, MONSTER CAPITAL  
CORP., SAFARI TRADING LLC, AND  
RICK SIEGEL,

Defendants.

Civil Action No.: 1:21-cv-07676-RA

**STIPULATION TO VACATE DEFAULTS**

WHEREAS, Plaintiff Gem City Management, Inc. (“Plaintiff”) filed a Complaint (Dkt. No. 1) on September 14, 2021 bearing the caption set forth above; and

WHEREAS, the Clerk entered Certificates of Default against defendants CKR Law LLP (“CKR”) and Jeffrey A. Rinde (“Rinde” and together with CKR, the “CKR Defendants”) on November 15, 2021 (Dkt. Nos. 29 and 30, the “Certificates of Default”); and

WHEREAS, Plaintiff has been granted leave to file an Amended Complaint on or before December 15, 2021; and

WHEREAS, Plaintiff and the CKR Defendants consent to vacate the Certificates of Default and extend the time for the CKR Defendants to appear in this action and otherwise to answer, move or otherwise respond to the operative pleading to January 31, 2022,

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for the Plaintiff and for the CKR Defendants as follows:

1. The Clerk’s Certificates of Default against the CKR Defendants (Dkt. Nos. 29 and 30) are hereby vacated; and

2. The CKR Defendants' time to appear in this action and otherwise to answer, move or otherwise respond to the operative pleading is hereby extended to January 31, 2021.

3. Each of the CKR Defendants hereby accept service of the Summonses issued in this action (Dkt. Nos. 12, 13).

4. Other than challenges to service and personal jurisdiction, all defenses available to the CKR Defendants are reserved.

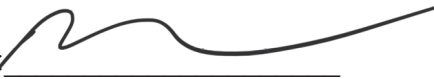
STIPULATED AND AGREED:

NEWMAN FERRARA LLP

By: 

Jeffrey M. Norton  
Benjamin D. Baker  
1250 Broadway, 27th Floor  
New York, NY 10001  
(212) 619-5400  
jnorton@nflp.com  
bbaker@nflp.com  
*Counsel for Plaintiff Gem City Management, Inc.*

FELICELLO LAW P.C.

By: 

Michael James Maloney  
366 Madison Avenue, 3<sup>rd</sup> Floor  
New York, NY 10017  
Tel. (212) 584-7806  
*Attorneys for Defendants CKR Law LLP and Jeffrey A. Rinde*

SO ORDERED:

Dated: November 29, 2021



Hon. Ronnie Abrams  
United States District Judge